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RICHARD M. BERMAN
U.S.D.J.

MEMO ENDORSED

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VIA OVERNIGHT DELIVERY

October 25, 2007

Hon. Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street, Room 650
New York, NY 10007-1312

Re: Great American Insurance Co. v. Martin L. Solomon, et al.
Docket No.07-Civ-6498 (RMB)

Extension granted to 11/13/07 (Final).
These are not completed
matters, i.e. to be to now
counsel + read the file. Let's
move this case along.

SO ORDERED,
Date: 10/29/07 Richard A. Berman
Richard M. Berman, U.S.D.J.

Dear Judge Berman:

We represent defendant John Dore in the matter captioned *Kingsway Financial Services, Inc. v. PricewaterhouseCoopers, LLC, et al.*, 03 Civ. 5560, to which the above-captioned interpleader action has been deemed to be a related action and assigned to this Court. Pursuant to this Court's pre-motion letter requirements, we write to ask this Court's permission to seek an extension of time for Mr. Dore to answer or otherwise plead to the First Amended Interpleader Complaint in this matter, filed September 17, 2007. By stipulation, the Interpleader-Plaintiff has allowed an extension of time for Mr. Dore to answer or otherwise plead until October 31, 2007; however, despite our further request on Mr. Dore's behalf, Interpleader-Plaintiff will not stipulate to a further extension of time.

Mr. Dore seeks an extension of time to permit him to retain new counsel with respect to this matter, in that he has decided – by agreement of this firm – that representation by counsel other than this firm would be appropriate for the interpleader action. He has begun the process of selecting counsel for that matter, including conducting interviews. He expects to make his selection in the near future. However, in order for any new counsel to become familiar with the facts of the underlying securities litigation pending before this Court, Mr. Dore would ask for an extension of time to December 31, 2007 to answer or otherwise plead.

This firm is prepared to submit a formal motion asking for this extension, should the Court deem it necessary.

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We thank the Court for its consideration of the above.

Very truly yours,

REARDON GOLINKIN & REED

By:

Scott O. Reed

cc: *(Via Fax and U.S. Mail)*

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